

UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

U.S. DISTRICT COURT – N.D. OF N.Y.

FILED

Mar 5 - 2025

John M. Domurad, Clerk

JANE DOE, JOHN DOE

Plaintiffs

-against-

JONATHAN REES aka GREG ELLIS
aka JOHNATHAN REES aka JONNY REES
aka JACOB LORENZO

Defendant

Case No.3:24-cv-274 (MAD/ML)

**REPLY TO ORDER ON MOTION
FOR DEFAULT JUDGMENT**

**PLAINTIFF’S REPLY TO ORDER TO SHOW CAUSE ON
MOTION FOR DEFAULT JUDGMENT AND
INCORPORATED MEMORANDUM OF LAW**

Plaintiffs JANE DOE, JOHN DOE (herein, “Plaintiffs”) submit this response to show cause as to why this case should not be dismissed as ordered by District Judge Mae A. D’Agostino.

"[T]he 'prior pending action doctrine' applies to the situation where there are two parallel cases pending in federal court." Ferrara v. Munro, 585 B.R. 269, 294 (D. Conn. 2018), however, Jane Doe in the other case referenced in this order, is not the same Jane Doe in this case, **EXHIBIT 1**, a letter filed on her docket by her Attorney, and why the prior pending action

doctrine doesn't apply and respectfully request for this case not to be dismissed and instead for default judgment to be granted in Plaintiff's favor or they will be left without relief for the many bad acts committed by Defendant against Plaintiffs.

If the case is dismissed or the default judgment is not granted, it would reward Defendant's bad behavior and isn't justice, especially as his abuse is still ongoing as of filing this response, with Defendant's exclusive derogatory websites set up to harm Plaintiff's and disrupt their lives, which is still live on the internet in violation of Honorable Judge Young's 3 year full stay away OOP against Defendant, who ordered Defendant to remove the websites and stop posting about Plaintiff's on social media, an order to protect Plaintiffs Jane Doe and John Doe II, and Jane Doe's other children, who are minors, which Defendant has chosen to ignore in violation of the OOP.

Dismissing Plaintiff's case against Defendant would set a bad precedent, rewarding Defendant for not responding to Plaintiffs claims or orders by the Court — Defendant had a second bite at the apple, with an additional opportunity to respond to Plaintiff's Motion for Default Judgment after the dates were reset by the Court 6 months after Plaintiff's Motion for Default Judgment had been submitted to the Court, however, Defendant chose yet again to not respond, instead, he has used his ex-girlfriend's case as a platform to abuse and expose Plaintiffs further, submitting documents that are not relevant to her claim against him.

As stated throughout, Defendant's pattern of abuse doesn't deviate from one woman to the next, and it continues for years without any let up and why it's important that he's held accountable for his bad acts and torts, to ensure he stops his bad behavior towards Plaintiffs, and acts like one would in normal society.

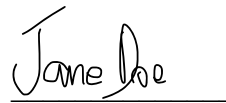
There are similarities with his behavior in his marriage to Dana Rees as noted in her declaration

submitted as part of Plaintiff's reply to motion for default judgment, and his other ex-girlfriend's, many experiencing the same bad acts, including Jane doe, Doe v. Rees et al., No. 3:23-CV-1352 (N.D.N.Y. Oct. 31, 2023) who has also received an OOP against Defendant — Jane Doe believes Plaintiff Jane Doe was involved in the harassment and malicious prosecution of her, which is all public record in Los Angeles and New York, damaging Plaintiffs, with Defendant committing identity theft and fraud, submitting statements he claimed were from Plaintiff Jane Doe in this case 3:24-CV-00274-MAD-ML in order to prosecute his ex-girlfriend, submitting faked documents using Plaintiff Jane Doe's signature, filed to two Courts, NY State Police and Chenango Sheriff's to portray himself as a victim and his ex-girlfriend as the abuser, when from reading filings in two court districts, and Plaintiff's experiences directly with Defendant, he is a serial abuser who will never stop until he's held accountable for his bad acts.

Plaintiffs may be Pro Se with limited knowledge of the court system, however, Plaintiffs have followed all court orders, spent significant time and money in order to litigate this action against Defendant, who has ignored the judicial process in an attempt to undermine the Justice system and avoid accountability for his bad acts and why Plaintiff's respectfully request that this action not be dismissed and a default judgement be ordered against Defendant in favor of Plaintiffs.

Respectfully submitted,

Dated: 05/03/2025

A handwritten signature in cursive script that reads "Jane Doe". The signature is written in black ink and is positioned above a horizontal line.

Jane Doe

Plaintiff